

January 21, 2022

VIA ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 5208 – Forward Capacity Market
National Grid’s Comments**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/d National Grid (“National Grid or the “Company”) enclosed is National Grid’s comments in the above-reference matter.¹ Per the Commission’s request, the Company is providing a copy of these comments to the individuals listed on the service list in Docket 5189.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Very truly yours,



Andrew S. Marcaccio

Enclosure

cc: Docket 5189 Service List
John Bell, Division
Margaret Hogan, Esq.

¹ Per a communication from Commission counsel on October 4, 2021, the Company is submitting an electronic version of this filing followed by six (6) hard copies filed with the Clerk within 24 hours of the electronic filing.

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

The Narragansett Electric Company d/b/a National Grid Forward Capacity Market)))))	Docket. No. 5208
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**THE NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL GRID
COMMENTS REGARDING STATUS/POSITION**

The Narragansett Electric Company d/b/a National Grid (the “Company”) appreciates the opportunity to submit written comments regarding its status/position in this docket. On January 20, 2022, the Division filed a position with argument supporting its position. The Company respectfully requests an opportunity to review the Division’s filing and reply with its own formal position paper with argument supporting the Company’s position. The procedural schedule suggests this additional layer of process would occur as it provides that “[t]he Commission will convene a procedural conference after receiving comments to discuss further procedure.”

I. BACKGROUND

On October 1, 2021, the Company filed its proposed 2022 Annual Energy Efficiency Plan with the Public Utilities Commission (“PUC”) in Docket No. 5189. As part of that filing, the Company indicated that it was anticipating incurring a financial assurance penalty in connection with bidding energy efficiency (“EE”) resources into the Forward Capacity Market (“FCM”).

On November 17, 2021, the Division submitted testimony in Docket No. 5189 in which it indicated that it planned on issuing more data requests on the FCM topic. The Company also was interested in receiving additional time to review the issues related to this topic. As such, the PUC opened a separate docket (Docket No. 5208) to review this FCM matter.

Since the opening of the separate docket, the Division issued an additional set of discovery to which the Company responded. After that set of discovery was issued and responded, the Company met with the Division to discuss the matter. The Company appreciates the Division taking time to meet with the Company. At that meeting, the Company provided the Division with its position that the Company should not absorb the full penalty amount. As reflected in the filing dated January 20, 2022, the Division rejected the Company's proposed position.

Per the procedural schedule, the parties were to file comments on their position/status by January 21, 2022. This document represents such comments by the Company.

II. COMPANY'S STATUS/POSITION

At this time, the Company and the Division are in disagreement as to whether the Company should absorb the entire FCM penalty. The Company believes that it should not. The Company highlights the following comments related to its position:

- To date, the Company has earned over \$110M in EE FCM revenue which has gone directly back to Rhode Island customers by offsetting the energy efficiency systems benefit charge.
- The Company does not receive a direct benefit or incentive for bidding EE resources into the FCM.

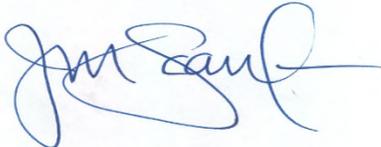
III. REQUESTED NEXT STEPS

The Company respectfully requests an opportunity to review the Division's filing dated January 20, 2022 and reply with its own formal position paper with argument supporting the Company's position.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

January 21, 2022
Date

**Docket No. 5189 - National Grid – 2022 Annual Energy Efficiency Program
Service list updated 12/15/2021**

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